BEFORE THE

PUBLIC SERVICE COMMISSION OF WISCONSIN

Matters Relating to Satisfaction of Conditions for Offering InterLATA Service (Wisconsin Bell, Inc. d/b/a Ameritech Wisconsin	)))	6720-TI-120

SEPARATE PETITION FOR REHEARING AND RECONSIDERATION of MCI TELECOMMUNICATIONS CORPORATION

MCI Telecommunications Corporation ("MCI"), by its undersigned attorneys, hereby separately petitions the Public Service Commission for rehearing and reconsideration of a portion of the Commission's Findings of Fact, Conclusions of Law and Second Order, dated May 30, 1997, in Docket 6720-TI-120 ("Second Order"). This petition is in addition to the joint petition for rehearing and reconsideration submitted by AT&T, MCI and CompTel. Specifically, MCI separately seeks (i) rehearing and reconsideration on issues relating to nonrecurring charges; and (ii) clarification relating to the allocation of access revenues in conjunction with the use of unbundled transport.

I. AMERITECH'S PROPOSED NON-RECURRING CHARGES SHOULD BE REJECTED PENDING A FULL INVESTIGATION OF THE UNDERLYING COSTS.

Ameritech's nonrecurring charges ("NRCs") are a significant barrier to entry, are not based on any serious examination of Ameritech's cost studies, and are furthermore supported by cost studies that are based on Ameritech's *old* OSS systems — systems that are now changing in favor of a more automated less costly process. For these reasons, the Commission should reject Ameritech's proposal and immediately initiate an investigation

into the issue of nonrecurring charges.

A. Inflated NRCs are a Significant Barrier to Entry.

The Commission must recognize that nonrecurring charges can be an extreme barrier to entry for new entrants, as it previously recognized that inflated NRCs were an unreasonable barrier to Centrex resale.

If a new entrant provides service to a customer via the use of unbundled loop leased from Ameritech, that new entrant will incur a service order charge and a line connection charge (in addition to other charges relating to any collocation that Ameritech requires in order to attach the unbundled loop to the new entrant's network). In Wisconsin, the sum of the service order and the line connection charge for a loop alone (no line switch port) would be $56.60 ($16.50 service charge per order plus $40.10 line connection per loop). Obviously, the more network elements the new entrant leased from Ameritech, the more nonrecurring charges that would be imposed.[1] In all likelihood, the new entrant will not be able to pass through these nonrecurring charges to the customers migrating from ILEC, which currently controls nearly 100% of the market share in Wisconsin. In the interexchange market, nonrecurring charges imposed by LECs to switch between IXCs are almost universally never passed on to end users and end users have come to expect that the transaction will come at zero cost to them. Thus, new entrants will be forced to recoup the nonrecurring charges imposed by Ameritech from profits earned in the recurring rates.

[1] Adding an unbundled line-side switch port would require an additional $71.93 in NRCs ($17.66 service ordering charge plus $54.27), not including charges associated with a trunk-side switch port required by Ameritech.

With nonrecurring charges as high as those imposed in Wisconsin, and with margins as low as they are in the residential market, then in all likelihood customers will "churn" away from the new entrant well before the new entrant will have had a chance to recoup the nonrecurring rates imposed. This will effectively foreclose competition in the residential market in Wisconsin.

B. Ameritech's Proposed NRCs are Inflated Above Cost.

On page 76 of the Second Order, the Commission properly recognized that "all nonrecurring charges must bear a reasonable relationship to their underlying costs." On page 77 of the Second Order, the Commission concluded that having reviewed Ameritech's costs, it found no "significant mismatches" between Ameritech's costs and Ameritech's revised proposed NRCs.

The implication in the Second Order that Ameritech's cost data has been examined is contrary to fact. In all of the Ameritech states besides Wisconsin — Ohio, Michigan, Indiana, and Illinois — the regulatory commissions have embarked on a serious examination of Ameritech's cost data with participation by all interested parties. Wisconsin has thus far failed to engage in any similar undertaking, limiting its examination of Ameritech costs to Staff's analysis.

A serious contested-case examination of Ameritech's costs will reveal serious overstatements of cost.[2] As but a single example, the nonrecurring charge for the line port

[1] The Second Order appears only to have examined the margin between Ameritech's reported costs and Ameritech's proposed nonrecurring charges.

portion of unbundled local switching appears to be based on the line connection study — clearly that is inadequate justification for this NRC. The NRCs imposed are not based on any serious examination of costs.

In addition, the factual basis underlying the cost studies Ameritech has presented have changed. Many of the NRCs at issue are directly related to Ameritech's OSS systems. As this Commission is fully aware, Ameritech has been changing — and continues to change — its OSS systems to comply with Section 271 requirements of the Federal Act. To the extent that Ameritech's OSS systems have changed, but those changes are not reflected in the nonrecurring charges, then Ameritech's NRCs are overstated.

This problem was acknowledged in recent testimony by Ameritech cost witness Palmer in Illinois. In that state's cost docket, Mr. Palmer was asked about the relationship between the OSS systems and the nonrecurring charges:

> Q: Do you know whether or not, Mr. Palmer, the plans of Ameritech to implement the EDI interface for ordering unbundled loops is reflected in the cost study supporting the service ordering charges that you have proffered in this proceeding?
>
> A: No. I think it is pretty clear that the service ordering charges that I've offered up here reflect the ASR interface.[3]

As was established in the OSS portion of the March 31 hearing, the ASR process is significantly more manual than the EDI process. Thus, per-customer nonrecurring cost studies based on the ASR process are going to be significantly higher than any cost study based on the forward-looking EDI processes.

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[3] ICC Investigation into forward looking cost studies and rates of Ameritech Illinois for interconnection, network elements, transport and termination of traffic. Docket 96-0486/96-0569 Consolidated, Transcript May 13, 1997, p. 489.

Similarly, with the line connection charge, there is a significant portion of costs relating to manual "coordination." As EDI-type processes get implemented that remove more manual processes, the nonrecurring costs should go down — and the nonrecurring charges should be lower.

Given the significant impact of nonrecurring charges on the development of local competition, given the lack of significant analysis of Ameritech's costs in this proceeding, and given the fact that Ameritech's OSS systems that serve as the basis for nonrecurring cost studies are changing, the Commission should reject Ameritech's proposed nonrecurring charges and initiate an investigation into the issue immediately.

II. THE COMMISSION SHOULD CLARIFY THAT CLECS ARE ENTITLED TO RETAIN ACCESS REVENUES WHEN USING UNBUNDLED COMMON TRANSPORT.

There is an ambiguity in the Second Order with respect to the use of unbundled common transport to carry originating and terminating access traffic. To remain otherwise consistent with the Commission's and the FCC's position on the use of unbundled network elements, the Commission should clarify that when CLECs purchase unbundled transport, whether dedicated or common transport, they are entitled to the access revenue associated with the purchased element.

As a preliminary matter, MCI believes that the Second Order is absolutely correct in its determination that Ameritech's existing proposal for common transport is deficient to the extent it requires CLECs to purchase customized routing and dedicated trunk ports and that Ameritech must be directed to refile its unbundled transport offering.

Next, the Second Order seems to recognize, as it should to be consistent with FCC rules, that purchasers of unbundled network elements are entitled to use such elements to provide access service, seemingly referring to 47 C.F.R. §§51.309, 51.515 (stayed); FCC order at para. 440, *et seq.*. Moreover, as noted on page 64 of the Second Order, "access revenues for any given portion of a toll call should accrue to the provider of that portion of the access services."

An example is then provided of TCG providing access service to a customer "PIC'd" to AT&T, using an unbundled loop and line-side switching purchased from Ameritech. (Page 65) The Second Order correctly determines that as the purchaser of the unbundled loop and local switching (even though Ameritech actually owns the switch and the copper wire loop), TCG is entitled to the access revenue from AT&T associated with the loop and local switching. However, with respect to the "transport" element of access service, the Second Order is somewhat less clear, drawing a distinction between transport over the "Ameritech access network" versus the "TCG access network." The Commission should clarify that when TCG purchases unbundled transport from Ameritech, whether dedicated or common, that this would constitute the "TCG access network," thus entitling TCG to collect access revenue from AT&T. In other words, the Commission should be consistant in its treatment of the use of unbundled network elements and CLECs should be permitted to retain access revenues associated with the "transport" element of access, even when using unbundled dedicated or common transport.

Any other conclusion is contrary to the FCC scheme, and moreover, would eviscerate any use of unbundled switching in Wisconsin. At all central offices where the

CLEC does not have sufficient volume to justify a dedicated access network, without the right to the access revenue, the CLEC will not be able to serve any customers using unbundled local switching, contrary to the purposes of the 1996 Act and the previously announced policy of this Commission.

CONCLUSION

For the foregoing reasons, MCI respectfully requests that the Commission reconsider its decision on Ameritech's nonrecurring charges and clarify its position on the use of unbundled common transport for exchange access service.

Respectfully submitted,

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June 20, 1997

VIA FACSIMILIE

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Dear Dan:

Attached for your review is the "Rough Justice" Factor methodology we discussed at our meeting of June 16, 1997. To insure we have a common understanding of the methodolgy, we have included numeric examples for each step of the process. Please review the document and provide me your comments as soon as possible.

Sincerely,

Bruce Bennett

BB/cv

"Rough Justice" Factor Methodology

This paper describes a methodology for implementing an interim "rough justice" means of measuring terminating usage which would enable CLECs to bill IXCs for terminating access, ILECs to bill for terminating unbundled local switching and both ILECs and CLECs to bill for reciprocal compensation and local toll access. Each subsequent process described is dependent on an outcome created in the preceding. Therefore, to accomplish all three objectives, the processes given below and the steps in each process must be followed in order, beginning with the calculations for IXC terminating access.

Process 1: Terminating Access (both interLATA and intraLATA toll)

Today, for each terminating toll call, the ILEC switch records the originating IXC, the terminating telephone number and the duration of the call. This would be sufficient information for CLECs using the unbundled local switch to bill IXCs for terminating access if the data could be sorted and identified by terminating CLEC based on line numbers. However, until now, there was no need for the ILEC to generate bills to the IXCs based on line numbers and thus capability does not currently exist for the ILEC to attribute the IXC usage to the proper CLEC based on the terminating line number. Until the ILEC develops the software necessary to properly attribute this usage, an interim measure to estimate the CLEC terminating usage based on factors applied to the originating IXC usage is reasonable.

Step 1 - The ILEC develops a terminating to originating (T/O) ratio for each end office (or LATA) based on the total IXC originating and terminating access minutes billed in the end office (or LATA).

$$T/O = IXC_{ALL}\ TMOUs / IXC_{ALL}\ OMOUs$$

Step 2 - The ILEC also develops a percentage of terminating IXC minutes of use for each IXC.

$$\%\ IXC_X\ TMOUs = IXC_X\ TMOUs / IXC_{ALL}\ TMOUs.$$

Step 3 - The ILEC measures originating usage for each CLEC to all IXCs, and will apply the T/O ratio developed in Step 1 to the total number of originating IXC minutes actually generated by each CLEC's customers at the unbundled local switch to estimate the total number of terminating minutes attributable to each CLEC's customers and for which the CLEC is entitled to bill terminating access.

$$CLEC\ X's\ IXC_{ALL}\ TMOUs = CLEC\ X's\ IXC_{ALL}\ OMOUs * T/O$$

Step 4 - For each CLEC the ILEC would then assign its estimated IXC terminating minutes of use to the interstate or intrastate jurisdiction using the existing percent interstate usage (PIU) factors.

CLEC X's IXC_{ALL} Interstate TMOUs = CLEC X's IXC_{ALL} TMOUs * PIU
CLEC X's IXC_{ALL} Intrastate TMOUs = CLEC X's IXC_{ALL} TMOUs * (1-PIU)

Step 5 - To determine how many terminating minutes came from each IXC by jurisdiction for each CLEC, the ILEC would assign IXC terminating minutes to each IXCs using the % IXC_X TMOU factors developed in Step 2.

CLEC X's $IXC_{(X)}$ Interstate TMOUs = CLEC X's IXC_{ALL} Interstate TMOUs * % IXC_X TMOUs
CLEC X's $IXC_{(X)}$ Intrastate TMOUs = CLEC X's IXC_{ALL} Intrastate TMOUs * % IXC_X TMOUs

Step 6: The interstate and intrastate terminating minutes thus developed for each CLEC for each IXC must be deducted from the ILEC's interstate and intrastate terminating minutes for each IXC to prevent double billing of access.

ILEC's $IXC_{(X)}$ TMOUs = Total $IXC_{(X)}$ TMOUs - All CLECs' $IXC_{(X)}$ TMOUs

EXAMPLE:

Step 1: Assume that the T/O factor is .98

Step 2: Assume that the % distribution of terminating MOUs by IXC is:

IXC 1 = 60%
IXC 2 = 25%
IXC 3 = 15%

Step 3: Assume there are two CLECs. CLEC A has 1000 OMOUs and CLEC B has 2000 OMOUs:

CLEC A TMOUs = 1000*.98 = 980 TMOUs
CLEC B TMOUs = 2000*.98 = 1960 TMOUs

Step 4: Assume that the existing PIU is 80%:

CLEC A's IXC_{ALL} Interstate TMOUs = 980 * .80 = 784
CLEC A's IXC_{ALL} Intrastate TMOUs = 980 * .20 = 196

CLEC B's IXC_{ALL} Interstate TMOUs = 1960 * .80 = 1568
CLEC B's IXC_{ALL} Intrastate TMOUs = 1960 * .20 = 392

Step 5 - Using the % IXC_X TMOU factors from Step 2:

CLEC A's IXC_1 Interstate TMOUs = 784 * .60 = 470.4
CLEC A's IXC_1 Intrastate TMOUs = 196 * .60 = 117.6

CLEC A's IXC_2 Interstate TMOUs = 784 * .25 = 196
CLEC A's IXC_2 Intrastate TMOUs = 196 * .25 = 49

CLEC A's IXC_3 Interstate TMOUs = 784 * .15 = 117.6
CLEC A's IXC_3 Intrastate TMOUs = 196 * .15 = 29.4

CLEC B's IXC_1 Interstate TMOUs = 1568 * .60 = 940.8
CLEC B's IXC_1 Intrastate TMOUs = 392 * .60 = 235.2

CLEC B's IXC_2 Interstate TMOUs = 1568 * .25 = 392
CLEC B's IXC_2 Intrastate TMOUs = 392 * .25 = 98

CLEC B's IXC_3 Interstate TMOUs = 1568 * .15 = 235.2
CLEC B's IXC_3 Intrastate TMOUs = 392 * .15 = 58.8

Step 6: If the ILECs Total IXC TMOUs were 10,000 and IXC_1 had 6000 TMOUs, IXC_2 had 2500 TMOUs and IXC_3 had 1500 TMOUs then:

ILEC's IXC_1 TMOUs = 6000 - 1800 = 4200
ILEC's IXC_2 TMOUs = 2500 - 750 = 1750
ILEC's IXC_3 TMOUs = 1500 - 450 = 1050

Process 2: Terminating Unbundled Switching Usage

Currently the ILEC cannot record the terminating non-IXC usage on its switches. They can, however, record originating minutes. To enable the ILEC to bill the CLECs for terminating unbundled local switching the following method is proposed:

Step 1: From the CLEC's total originating minutes subtract the minutes that went to an IXC.

CLEC X's Non-IXC OMOUs = CLEC X's Total OMOUs - CLEC X's IXC OMOUs

Step 2: From the CLEC's non-IXC originating minutes remove the percentage of minutes that were intraswitch. Intraswitch minutes should not be billed as terminating minutes. The ILEC will develop the percentage of minutes originating in a switch that terminate in the same switch based on recorded data.

CLEC X's Interswitch Non-IXC OMOUs = CLEC X's Non-IXC OMOUs * %Intraswitch

Step 3: For non-IXC calls, every recorded originated call is completed within the LATA therefore every originating minute has a corresponding terminating minute.

CLEC X's Interswitch Non-IXC TMOUs = CLEC X's Interswitch Non-IXC OMOUs

Step 4: To obtain all the CLEC's terminating minutes that used the unbundled local switch, the IXC terminating minutes developed for the CLEC in Process 1, Step 3, must be added.

CLEC X's Interswitch TMOUs = CLEC X's Interswitch Non-IXC OMOUs + CLEC X's (IXC) TMOUs

EXAMPLE: Using CLEC A from the first example and assuming that CLEC A had a total of 10,000 originating minutes:

Step 1:

CLEC A's Non-IXC OMOUs = 10,000 - 1,000 = 9,000

Step 2: Assume that the intraswitch percentage is 40%

CLEC A's Interswitch Non-IXC OMOUs = 9,000 * .40 = 5,400

Step 3:

CLEC A's Interswitch Non-IXC TMOUs = 5,400

Step 4:

CLEC A's Interswitch TMOUs =5,400 + 980 = 6,380

Terminating local toll access and reciprocal compensation

Until the industry evolves to the point that each CLEC is assigned a carrier identification code and these codes are passed through the network and recorded at the terminating switch (similar to how an IXC operates), local toll access and reciprocal compensation (if bill and keep arrangements are not in place) will have to be estimated based on factors. The proposed methodology for accomplishing this interim measure is as follows:

Process 3 - For states which have implemented 2-PIC

In states which have implemented 2-PIC, CLECs who are intraLATA toll providers will be assigned a carrier identification code. When a CLEC customer makes a toll call, the call will be routed to the CLEC's point of presence (POP). The access bill to this CLEC will follow the steps described for Process 1 above. To the extent that the CLEC does not have a POP, then the steps described below for non-2-PIC states will apply for those CLECs.

A UNE platform CLEC will determine terminating local toll access and reciprocal compensation (if necessary) using the following steps:

Step 1: A percent local usage (PLU) factor is applied to the non-IXC terminating unbundled local switching minutes derived in Process 2, Step 3, above. This factor will separate local toll usage from local usage. The PLU factor may be determined at the end office or at the LATA level.

A. CLEC X's Local Toll TMOUs = CLEC X's Interswitch Non-IXC TMOUs * (1-PLU)
B. CLEC X's Local TMOUs = CLEC X's Interswitch Non-IXC TMOUs * PLU

Step 2: Under the assumption that, in a 2-PIC state, all originating calls from CLECs will go to the CLEC's POP, and all terminating calls except those originated by the ILEC, will come from the POP, the terminating local toll minutes derived by applying the PLU factor in Step 1 will be billed by the CLEC to the ILEC for local toll access.

EXAMPLE: Using CLEC A's results from Process 2, Step 3

Step 1A: Assume that the PLU is 80%

CLEC A's Local Toll TMOUs = 5,400 * .20 = 1,080

Step 1B: If reciprocal compensation must be billed (no bill and keep arrangements) CLEC A is entitled to reciprocal compensation for:

CLEC A's Local TMOUs = 5,400 * .8 = 4,320 minutes

The steps outlined below for non-2-PIC states will be used to determine how LCEC A would allocate those 4,320 minutes among all of the LECs (ILECs and CLECs) operating in the LATA.

Process 4 - For states that have not implemented 2-PIC arrangements

When local and local toll calls to and from a CLEC use the ILEC's network, the following process will be employed to determine the appropriate local toll access and reciprocal compensation:

Step 1: A percent local usage (PLU) factor is applied to the non-IXC terminating unbundled local switching minutes derived in Process 2, Step 3, above. This factor will separate local toll usage from local usage. The PLU factor may be determined at the end office or at the LATA level.

A. CLEC X's Local Toll TMOUs = CLEC X's Interswitch Non-IXC TMOUs * (1-PLU)
B. CLEC X's Local TMOUs = CLEC X's Interswitch Non-IXC TMOUs * PLU

Step 2: To the results of Step 1A, each CLEC will apply a second set of factors based on the percent of lines (or minutes) attributable to each ILEC and CLEC operating in the

LATA to determine how those minutes are to be allocated among the ILECs and CLECs for access billing purposes.

ILEC A Factor = ILEC A Lines/Total Lines
CLEC A Factor = CLEC A Lines/Total Lines
CLEC B Factor = CLEC B Lines/Total Lines
CLEC C Factor = CLEC C Lines/ Total Lines

ILEC A Local Toll TMOUs Billed by CLEC A = CLEC A's Local Toll TMOUs * ILEC A Factor
CLEC B Local Toll TMOUs Billed by CLEC A = CLEC A's Local Toll TMOUs * CLEC B Factor
CLEC C Local Toll TMOUs Billed by CLEC A = CLEC A's Local Toll TMOUs * CLEC C Factor

Step 3: To the extent that there are no bill and keep arrangements in place, the Local TMOUs determined in Step 1B are the qualifying local minutes for reciprocal compensation purposes. Those local minutes will be allocated to the ILEC and to other CLECs for the billing of reciprocal compensation using the same factors as outlined in Step 2.

Step 4: As in Process 1, Step 6, the ILEC must deduct the terminating minutes thus developed for each CLEC from the ILEC's local toll terminating minutes to prevent double billing of access.

ILEC's Local Toll TMOUs = Total Local Toll TMOUs - All CLECs' Local Toll TMOUs

EXAMPLE: If CLEC A has 5,400 non-IXC TMOUs from Process 2, Step 3

Step 1A: Assume a PLU factor of 80%

CLEC A's Local Toll TMOUs = 5,400 * .20 = 1,080

Step 1B: If reciprocal compensation must be billed (no bill and keep arrangements) CLEC A is entitled to reciprocal compensation for:

CLEC A's Local TMOUs = 5,400 * .8 = 4,320 minutes

Step 2: Assume that there is one ILEC and 3 CLECs operating in the LATA and the distribution is as follows:

ILEC = 90%
CLEC A = 5%
CLEC B = 3%
CLEC C = 2%

For access billing, from Step 1A, CLEC A has 1,080 minutes which will be distributed as follows:

ILEC = .90*1080 = 972
CLEC A = .05*1080 = 54 (assuming that CLEC A would bill itself for access)
CLEC B = .03*1080 = 32.4
CLEC C = .02*1080 = 21.6

Step 3: If reciprocal compensation is billed, then CLEC A will use the minutes derived in Step 1B and allocate them using the factors from Step 2.

ILEC = .90*4320 = 3888
CLEC A = .05*4320 = 216 (CLEC A will probably not bill itself)
CLEC B = .03*4320 = 129.6
CLEC C = .02*4320 = 86.4

AT&T/Ameritech
Phase 1 Read Out - July 1, 1997

- Receipt and tracking of 997, 855, & 865's was inconclusive for Round A
- Receipt of 997, 855, & 865's was as expected for Round B.

- 548 of 580 individual calls in Round A were successful
  - Failures consisted of 23 LCC errors, 4 LIDB problems, and 5 were retest of previous failures
- 181 of 184 individual calls in Round B were successful

- 12 of the 19 lines tested in Round A were completely successful; 7 lines were partially successful
- 18 of the 20 lines tested in Round B were completely successful; 2 lines were partially successful

- 2 of 8 LCC's in Round A were completely successful; 6 were partially successful
- 7 of 8 LCC's in Round B were completely successful; 1 was partially successful

AT&T/Ameritech
Phase 1 Read Out - July 1, 1997

- Complete successes in 4 of the 10 categories of call types in Round A; partial successes in 6 categories
- Complete successes in 9 of the 10 categories of call types in Round B; partial successes in 1 category

- Lines 5, 9, 10, 12, 13, 14, 15, 16, 17, 18, 19, and 20 tested successfully in Round A

- Lines 1, 2, 3, 4, 5, 6, 7, 9, 10, 12, 13, 14, 15, 16, 17, 18, 19, and 20 tested successfully in Round B

- It was known at Trial start that the 900 translation for Directory Assistance requested by AT&T would not work as requested.

AT&T/Ameritech
Phase 1 Read Out - July 1, 1997

Number of Successful Calls / Total Calls

LCC	Round A	Round B
unrestricted	**206/206**	114/115
900	55/56	**8/8**
976	52/54	**10/10**
900/976	42/50	**13/13**
toll	47/51	8/10
international	**51/51**	**12/12**
900/976/toll	49/59	**16/16**
900/976/international	46/53	0/0
Total	548/580	181/184

AT&T/Ameritech
Phase 1 Read Out - July 1, 1997

Specific Call Failures:

Round A

Qty	Call Type
3	0
3	0+10D local
2	0+10D IntraLATA toll
2	0+10D Band C
1	0+10D InterLATA toll
2	411
2	555-1212
4	011 International
1	10XXX
1	101XXX
1	976
1	1+900
2	Third Party (LIDB database problem)
2	Collect (LIDB database problem)
6	Retests of previous failures

Round B

Qty	Call Type
1	011 International
2	Feature errors

AT&T / Ameritech
Phase I Read Out - July 1 1997
EMR Usage Data - AT&T Issues

- There was significant usage on the test lines not recorded by the log
- Indicator 6 should not be populated with 1 - AT&T records shouldn't be rounded
- Indicator 13 should be set to 5, but is being inconsistently applied to our local records
- Indicator 15 is set to 1 incorrectly - AT&T records should be unrated
  except for information service provider calls
- Indicators 20, 25, 26, 30 are for local use, but AIIS populated those fields
  without AT&T agreement
- The CIC code was populated with 0288, but should have been populated 0's as local calls

AT&T / Ameritech
Phase I Read Out - July 1 1997

•Receipt and tracking of 997, 855, & 865's was inconsistent for Round A
•Receipt of 997, 855, & 865's was as expected for Round B

•Failures on 32 out of 580 individual calls in Round A
•Failures on 3 out of 184 individual calls in Round B
•Of the 32 failures, 23 were LCC failures, 4 were LIDB, and 5 were retests of previous failures

•There were failures on 7 out of 19 lines tested in round A
•There were failures on 2 out of 20 lines tested in Round B

•There were failures with 6 of the 8 LCC's in Round A
•There were failures with 1 of the 8 LCC's in Round B

•Failures on 6 out of 10 categories of call types in Round A
•Failures on 1 out of 10 categories of call types in Round B